

# **EXHIBIT A-1**

FILED  
9/19/2017 9:18 AM  
Donna Kay McKinney  
Bexar County District Clerk  
Accepted By: Krystal Gonzalez

2 cit pps sac1

CAUSE NO. **2017CI18043**

ANA BETANCOURT,

Plaintiff's

v.

MARTIN ALLEN ALFORD AND  
CELADON TRUCKING SERVICES,  
INC.,

Defendants

IN THE DISTRICT COURT

**150** JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

---

**PLAINTIFF'S ORIGINAL PETITION AND  
REQUEST FOR DISCLOSURE**

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TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Plaintiff, Ana Betancourt, and files this Original Petition, complaining of Defendants Martin Allen Alford and Celadon Trucking Services, Inc. and would respectfully show the Court the following:

**I.**  
**DISCOVERY**

1. Plaintiff intends to conduct discovery in this suit under Level Three, pursuant to Rule 190.4 of the Texas Rules of Civil Procedure, and will seek an order, agreed or otherwise, to this effect.

**II.**  
**PARTIES**

2. Plaintiff, Ana Betancourt is a natural person, and, at all times relevant to this cause of action, has been and continues to be a resident and citizen of the state of Texas.

3. **Defendant.** Martin Allen Alford ("Defendant Alford") is a natural person, and, at all times relevant to this cause of action, has been and continues to be a resident of Mount Olive, North Carolina, and can be served at 738 Louisiana Springs Rd., Mount Olive, North Carolina 28365, or wherever he may be found.

4. **Defendant.** Celadon Trucking, Inc. ("Defendant Celadon") is a foreign corporation authorized to do business in Texas and may be served with process by serving its registered agent for service, Cogency Global, Inc., 1601 Elm Street, Suite 4360, Dallas, Texas 75201.

Pursuant to TEX. R. CIV. P. 28, if any Defendant to this suit has been incorrectly named, it is instructed to answer suit in its proper name.

### **III.**

#### **JURISDICTION AND VENUE**

5. The subject matter in controversy is within the jurisdictional limits of this court.

6. This court has jurisdiction over Defendants because Defendants conduct business in the state of Texas.

7. Venue is proper in Bexar County, Texas, pursuant to TEX. CIV. PROC. & REM. CODE, § 15.002(a)(1) in that all or substantially all of the events or acts or omissions giving rise to the claim occurred in Bexar County, Texas.

### **IV.**

#### **FACTS**

8. On May 23, 2017, Plaintiff was driving a 2014 Chevrolet Malibu traveling in the right lane and heading northbound on the 18700 block of IH 35 S near the intersection of Luckey Road in Bexar County, Texas, and was slowing down and attempting to pull over to the side of the road due to bad weather. Defendant Alford, who was driving a 2014 International tractor-trailer

combination and towing a vehicle, was traveling in the center lane and also heading northbound on IH 35 S and crossed over into Plaintiff's lane causing his tractor trailer to collide with the driver's side of Plaintiff's vehicle. As a result of the collision, Plaintiff suffered severe and debilitating injuries.

**V.  
AGENCY AND RESPONDEAT SUPERIOR**

9. At the time of the collision and the occurrences giving rise to this cause of action, Defendant Alford was the operator of the tractor-trailer combination that was owned and/or maintained and/or leased and/or operated by Defendant Celadon and was a statutory employee of Celadon.

10. Defendant Celadon, at the time of the collision was, upon information and belief, an interstate carrier or federal motor carrier.

11. At all times material hereto, Defendant Alford was acting as a statutory employee of Defendant Celadon and was within the course and scope of his employment or official duties for Defendant Celadon in furtherance of the duties of his office or employment for Defendant Celadon.

12. Moreover, at the time of the collision and at all other times relevant hereto, Defendant Alford was operating under the authority of Defendant Celadon as an interstate or federal motor carrier.

13. Defendant Celadon, as the statutory employer and motor carrier, is responsible for the negligent acts or omissions of Defendant Alford under the principles of respondeat superior and/or by virtue of statutory provisions including the Federal Motor Carrier Safety Act.

14. Defendant Celadon, as the employer, is responsible for the negligent acts or omissions of Defendant Alford under the principles of respondeat superior.

**VI.**  
**NEGLIGENCE**

15. Plaintiff would show that, on the occasion in question, Defendants owed a duty to conduct themselves in a manner consistent with the traffic laws of the State of Texas and the United States and to act as a reasonably prudent person and/or entity would act.

16. Defendant Alford breached his duty to Plaintiff and acted in a manner that was negligent or negligent per se by engaging in wrongful conduct including, but not limited to:

- a. Failing to keep such a proper lookout as a person exercising ordinary prudence would have kept under the same or similar circumstances;
- b. Failing to take timely or proper evasive action to avoid the collision in question;
- c. Failing to yield the right of way;
- d. Failing to pay attention; and
- e. Failing to control the subject vehicle so that a collision would not occur.

17. Defendant Celadon had a duty to exercise ordinary care to hire, train and supervise its driver with respect to ensuring that he was and would continue to be a safe driver with knowledge of the matters necessary for the proper operation of the vehicle that he controlled.

18. Defendant Celadon breached its duty because it knew or should have known that Defendant Alford was not a capable, qualified and knowledgeable driver.

19. Defendant Celadon breached their duty because they failed to provide the necessary training for Defendant Alford to operate his vehicle in a safe manner and in conformity with the requirements of the law.

20. Defendant Celadon breached its duty because it failed to supervise Defendant Alford to ensure that he operated his vehicle in a safe manner and could accomplish his work assignments in a safe manner.

21. Each of Defendants' acts and omissions, singularly or in combination with others, constituted negligence and/or negligence per se that proximately and substantially caused the occurrence made the basis of this action, and the personal injuries and damages sustained by Plaintiff

22. Plaintiff would show that, as a proximate cause of Defendants' negligence, as described herein, Plaintiff has sustained damages far in excess of the minimum jurisdictional limits of this Court.

## **VII.** **DAMAGES**

23. As a direct and proximate result of Defendants' negligence, Plaintiff suffered severe personal injuries, pain, suffering, mental anguish, disability, impairment, and disfigurement, lost wages, lost earning capacity, and incurred reasonable and necessary medical expenses for the care and relief of his injuries. For a long time to come, if not for the rest of her life, Plaintiff will continue to suffer physical injuries, physical impairment, disfigurement, pain and suffering, and mental anguish. Additionally, as a result of the incident, Plaintiff will incur reasonable and necessary medical expenses in the future. Plaintiff now sues for all of these damages in an amount that exceeds the minimum jurisdictional limit of this Court.

24. Pursuant to Texas Rule of Civil Procedure 47, Plaintiff asserts that she is seeking monetary relief in excess of \$200,000.00 but less than \$1,000,000.00.

25. Plaintiff is entitled to recover pre-judgment and post-judgment interest as allowed by law.

**VIII.**  
**CONDITIONS PRECEDENT**

26. All conditions precedent have been performed or have occurred to support the Plaintiff's pleadings and causes of action.

**IX.**  
**REQUESTS FOR DISCLOSURE**

27. Pursuant to TEXAS RULE OF CIVIL PROCEDURE 194, Defendants are hereby requested to disclose, within fifty (50) days of service of this request, the information or material described in Rule 194.2 (a-l).

**X.**  
**NOTICE PURSUANT TO RULE 193.7, TEX. R. CIV. P.**

28. Notice is hereby given to all parties herein that Plaintiff intends to use all documents produced by each party in pretrial and/or trial of this cause, to the extent allowed pursuant to the Texas Rules of Civil Procedure.

**XI.**  
**REQUEST FOR JURY TRIAL**

29. Plaintiff respectfully requests a trial by jury and has paid the jury fee.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that Defendants be cited to appear and answer herein and that on final trial, Plaintiff have judgment against Defendants, jointly and severally, for:

1. All medical expenses in the past and future;
2. Mental anguish in the past and future;
3. Physical pain in the past and future;
4. Physical impairment in the past and future;
5. Lost wages; aMAlle

6. Lost earning capacity;
7. Disfigurement in the past and future;
8. Pre- and post-judgment interest as allowed by law;
9. Costs of suit; and
10. Such other and further relief to which Plaintiff may be justly entitled.

Respectfully submitted,

**WYATT LAW FIRM, LTD.**  
21 Lynn Batts Lane, Suite 10  
San Antonio, Texas 78218  
Telephone: (210) 340-5550  
Facsimile: (210) 340-5581

By: /s/ Paula A. Wyatt

Paula A. Wyatt  
State Bar No. 10541400  
e-serve@wyattlawfirm.com  
Clavin McInnis  
State Bar No. 13679800  
e-serve@wyattlawfirm.com  
Louis Durbin  
State Bar No. 24078448  
e-serve@wyattlawfirm.com  
**ATTORNEYS FOR PLAINTIFF**



## **EXHIBIT A-2**

Case Number: 2017-0-10040

2020 2021 2022

52

IN THE DISTRICT COURT  
150th JUDICIAL DISTRICT  
BEXAR COUNTY, TEXAS

"THE STATE OF TEXAS"

Created To: MARTIN ALLEN ALFORD

ISSUED UNDER MY HAND AND SEAL OF SAO COURT ON THIS 21ST DAY OF SEPTEMBER A.D., 2017

Donna Kay McKinney  
Bexar County District Clerk  
101 W. Nueva, Suite 217  
San Antonio, Texas 78205

by: Christopher Monroe Dobut

Officer's Return

Case Number: 2012-01-00043  
Court: 118th Judicial District Court

I hereby certify that \_\_\_\_\_ has been \_\_\_\_\_ by \_\_\_\_\_ and \_\_\_\_\_  
\_\_\_\_\_ and \_\_\_\_\_ are the \_\_\_\_\_ of \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Source of information .....  
 4. Signature .....  
 5. Date .....

[illegible][illegible]

I hereby certify that the foregoing is true and correct. Executed in \_\_\_\_\_, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

2008-08-25

1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 26

## **EXHIBIT A-3**

PRIVATE PROCESS

Case Number: 2017-CI-18043

2017CI18043 300002

ANA BETANCOURT

VS.

MARTIN A ALFORD ET AL

(Date Attached Document May Contain Additional Filings)

IN THE DISTRICT COURT  
150th JUDICIAL DISTRICT  
BEXAR COUNTY, TEXAS

## CITATION

'THE STATE OF TEXAS'

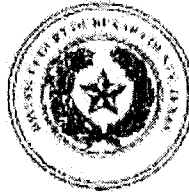
Directed To: CELADON TRUCKING SERVICES INC

BY SERVING ITS REGISTERED AGENT, COGENCY GLOBAL INC

"You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this CITATION and ORIGINAL PETITION AND REQUEST FOR DISCLOSURE, a default judgment may be taken against you." Said ORIGINAL PETITION AND REQUEST FOR DISCLOSURE was filed on the 19th day of September, 2017.

ISSUED UNDER MY HAND AND SEAL OF SAID COURT ON THIS 21ST DAY OF SEPTEMBER A.D., 2017.

PAULA A WYATT  
ATTORNEY FOR PLAINTIFF  
21 LYNN BATTS LN 10  
SAN ANTONIO, TX 78218



Donna Kay McKinney  
Bexar County District Clerk  
101 W. Nueva, Suite 217  
San Antonio, Texas 78205

By: Christopher Morrow, Deputy

ANA BETANCOURT  
VS.  
MARTIN A ALFORD ET AL

## Officer's Return

Case Number: 2017-CI-18043  
Court: 150th Judicial District Court

I received the CITATION on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M. and I executed it by delivering a copy of the CITATION with attached ORIGINAL PETITION AND REQUEST FOR DISCLOSURE on the date of delivery executed on it to \_\_\_\_\_ in person on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M. at \_\_\_\_\_ or I have executed herein \_\_\_\_\_

Fees \_\_\_\_\_ Badge/PPS # \_\_\_\_\_ Date certification expires \_\_\_\_\_ County: Texas

By: \_\_\_\_\_

OR VERIFICATION OF RETURN (if not served by a peace officer) SWORN TO THIS \_\_\_\_\_

NOTARY PUBLIC, STATE OF TEXAS

OR, My name is \_\_\_\_\_ my date of birth is \_\_\_\_\_ and my address is \_\_\_\_\_ County \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct. Executed in \_\_\_\_\_ County, State of Texas, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

Declarant \_\_\_\_\_

ORIGINAL (00002)

## **EXHIBIT A-4**

**Kenneth Carpenter**

---

**From:** SOP@cogencyglobal.com  
**Sent:** Thursday, October 26, 2017 2:33 PM  
**To:** Dennis Elschide  
**Cc:** Kenneth Carpenter; Claire Sakurada; Morgan Bick  
**Subject:** Service of Process for Entity: CELADON TRUCKING SERVICES, INC.



## NOTICE OF SERVICE OF PROCESS

**Entity Served:** CELADON TRUCKING SERVICES, INC.  
**Received in:** Texas

COGENCY GLOBAL INC. has received the enclosed document on behalf of the above named entity. As the appointed registered agent or agent for service of process for the entity, we are forwarding the document to you. By clicking the **"Retrieve Document"** button you acknowledge the receipt of this service of process on behalf of the entity listed.

**Client Group:** CELADON GROUP, INC.  
**SOP Number:** SP490639  
**Document Type:** Citation & Petition  
**Date of Service:** 10/26/2017  
**Service Method:** Personal  
**Court:** In the District Court 150th Judicial District Bexar County, Texas  
**Document Caption:** Ana Betancourt vs. Martin Allen Alford and CELADON TRUCKING SERVICES, INC.  
**Case Number:** 2017-CI-18043  
**Original to Follow:** Yes  
**Original Being Sent To:** Dennis Elschide  
Celadon Group, Inc.  
9503 E. 33rd Street  
Indianapolis, IN 46235  
**Delivery Method:** FedEx  
**Tracking Number:** 770597676757

**[Click Here to Retrieve Document](#)**

## **EXHIBIT A-5**

34666.022  
/ui/gea/Betancourt.ana/orig answer  
11/16/17/GEA/bjw

NO. 2017CI18043

ANA BETANCOURT	§	IN THE DISTRICT COURT
	§	
	§	
VS.	§	150 <sup>th</sup> JUDICIAL DISTRICT
	§	
MARTIN ALFORD AND CELADON	§	
TRUCKING SERVICES, INC.	§	BEXAR COUNTY, TEXAS

**DEFENDANT CELADON TRUCKING SERVICES, INC.'S ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes defendant CELADON TRUCKING SERVICES, INC. and files this its Original Answer, and for such would respectfully show unto the Court as follows:

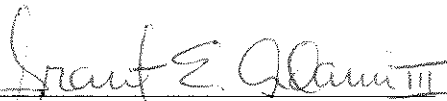
I.

Defendant denies generally the allegations contained in Plaintiff's Original Petition, and asks for a trial of the issues before a jury.

WHEREFORE, PREMISES CONSIDERED, defendant prays for judgment and general relief.

Respectfully submitted,

ADAMI, SHUFFIELD, SCHEIHING & BURNS, P.C.  
SWBC Tower  
9311 San Pedro, Suite 900  
San Antonio, Texas 78216  
Telephone: (210) 344-0500  
Telecopier: (210) 344-7228

By 

GRANT E. ADAMI, III  
State Bar No. 00845400  
[tadami@adamilaw.com](mailto:tadami@adamilaw.com)

ATTORNEYS FOR DEFENDANT  
CELADON TRUCKING SERVICES, INC.



**CERTIFICATE OF SERVICE**

I certify that on this 17<sup>th</sup> day of November, 2017, a true copy of the foregoing has been forwarded by mail and/or by facsimile to:

Paula A. Wyatt  
Gavin McInnis  
Louis Durbin  
Wyatt Law Firm, Ltd.  
21 Lynn Batts Lane, Suite 10  
San Antonio, Texas 78218  
Telephone: (210) 340-5550  
Telecopier: (210) 340-5581  
e-serve@wyattlawfirm.com

ATTORNEYS FOR PLAINTIFF

  
GRANT E. ADAMI, III

## **EXHIBIT A-6**

34666.022  
/ui/gea/Betancourt.ana/orig answer Alford  
11/20/17/GEA/bjw

NO. 2017CI18043

ANA BETANCOURT	§	IN THE DISTRICT COURT
	§	
	§	
VS.	§	150 <sup>th</sup> JUDICIAL DISTRICT
	§	
MARTIN ALLEN ALFORD AND CELADON	§	
TRUCKING SERVICES, INC.	§	BEXAR COUNTY, TEXAS

**DEFENDANT MARTIN ALLEN ALFORD'S ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes defendant MARTIN ALLEN ALFORD and files this his Original Answer, and for such would respectfully show unto the Court as follows:

I.

Defendant denies generally the allegations contained in Plaintiff's Original Petition, and asks for a trial of the issues before a jury.

WHEREFORE, PREMISES CONSIDERED, defendant prays for judgment and general relief.

Respectfully submitted,

ADAMI, SHUFFIELD, SCHEIHING & BURNS, P.C.  
SWBC Tower  
9311 San Pedro, Suite 900  
San Antonio, Texas 78216  
Telephone: (210) 344-0500  
Telecopier: (210) 344-7228

By   
GRANT E. ADAMI, III  
State Bar No. 00845400  
[tadami@adamilaw.com](mailto:tadami@adamilaw.com)

ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I certify that on this ~~21st~~ day of November, 2017, a true copy of the foregoing has been forwarded by mail and/or by facsimile to:

Paula A. Wyatt  
Gavin McInnis  
Louis Durbin  
Wyatt Law Firm, Ltd.  
21 Lynn Batts Lane, Suite 10  
San Antonio, Texas 78218  
Telephone: (210) 340-5550  
Telecopier: (210) 340-5581  
e-serve@wyattlawfirm.com

ATTORNEYS FOR PLAINTIFF

  
GRANT E. ADAMI, III